

BREDHOFF & KAISER, P.L.L.C.
Attorneys & Counselors
805 Fifteenth Street, N.W.
Washington, D.C. 20005-2207
(202) 842-2600
Facsimile: (202) 842-1888
<http://www.bredhoff.com>

Julia Penny Clark
Jeffrey R. Freund
W. Gary Kohlman
Jeremiah A. Collins
Mady Gilson
Bruce R. Lerner
Andrew D. Roth
John M. West
Douglas L. Greenfield
Roger Pollak
Anne Ronnel Mayerson
Leon Dayan
Devki K. Virk
Robert Alexander
Matthew Clash-Drexler
Abigail V. Carter
Joshua B. Shiffrin
Ramya Ravindran

Elliot Bredhoff
(1921 – 2004)
Henry Kaiser
(1911 – 1989)

Daniel A. Zibel
Raphael Rajendra
Jacob Karabell
Tanaz Moghadam
Thomas W. Perez-Lopez
Zachary Ista
Caitlin Kekacs

Laurence Gold
Patricia Polach
Susan G. Lahne
Kathleen Keller
Jenifer A. Cromwell
Philip C. Andonian
Tearyn J. Loving

Of Counsel

Robert M. Weinberg
Senior Counsel

April 11, 2014

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The Honorable Susan D. Wigenton
U.S. District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, N.J. 07101

**Re: Care One Management, LLC et al. v. United Healthcare Workers
East, SEIU 1199 & New England Healthcare Employees Union,
District 1199 (Civil Action No. 2:12-cv-06371)**

Dear Judge Wigenton:

As you know, we represent Defendants in the above-captioned action. In lieu of filing a motion, we write this letter to respectfully request up to five additional pages for our reply brief in support of our motion to dismiss Plaintiffs' Amended Complaint, which would set the page limit for this reply brief at 20 pages.

Although we have tried to comply with the default limit of 15 pages, we believe that up to five additional pages are necessary to sufficiently address the arguments in Plaintiffs' opposition. This is so because our motion implicates a number of legal issues, including (a) whether Plaintiffs have properly pled RICO predicate acts of mail or wire fraud, (b) whether Plaintiffs have properly satisfied the separate "wrongful use" and "obtaining property"

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elements of RICO extortion, and (c) whether Counts I and II of Plaintiffs' Amended Complaint should be dismissed for failure to allege the necessary RICO injury.

We note that we did not request any additional pages for our opening brief in support of our motion to dismiss.

Thank you in advance for your consideration of this request.

Respectfully,

/s/ Leon Dayan

Leon Dayan
(admitted *pro hac vice*)

/s/ R. Scott Thompson
R. Scott Thompson
Lowenstein Sander LLP
65 Livingston Avenue
Roseland, N.J. 07068
T: 978-597-2532
F: 978-597-2533
Counsel for Defendants

CC. via ECF: All Counsel of Record